NORTH MANCHESTER FOUNDRY, INC.

P. O. BOX 345
NORTH MANCHESTER
INDIANA 46962
AREA 219 982-2191

1B2

August 11, 1983

Division of Land Pollution Control
State Board of Health
1330 W. Michigan Street
P.O. Box 1964
Indianapolis, Indiana 46206-1964

Attention: Mr. David Koepper

SUBJECT: INDUSTRIAL LANDFILL AT OUR PLANT

Dear Sir:

Please consider this as a formal request for extension for compliance time per your Mr. Doyle's letter of July 25, 1983.

We have retained "RMT" who has now taken 18 samples of various materials and they are in process of performing various studies at great cost to an already cost/price burdened operation. This testing is expected to be completed at, as what is still an undetermined time.

Secondly, we are sorting weighing and retaining for a period of 30 days, all wastes so that proper determinations can be made as to composite averages. As noted on page 3 of the "RMT" letter, we believe it will be about 6 more weeks before all of this data will be summarized for our final report as it refers to your first request in Mr. Doyles letter.

As to your Item 2 - We are collecting for future reference the specific materials. In view of this, I don't see how we can cease operations short of shutting down. You further suggest restricting access. We already consider access to be significantly restricted. We are boardered by rivers, fences, and a street of which all access is guarded by either fence, office building or our parking lot. Likewise, we have numerous signs warning against tresspassing. Also be advised, that we have added significantly more signs. A photo of one such sign is included.

In conclusion, we are asking your cooperation for an extension until October 1, 1983.

We Thank you for your cooperations in this matter, which we regard with great concern.

Respectfully,
NORTH MANCHESTER FOUNDRY, INC.

R. Westman

RW:lu
enclosures - RMT Letter
- Photo

Residuals Management Technology, Inc.

Great Lakes Office
P.O. Box 447
Grand Ledge, Michigan 48837
(517) 627-3991

August 9, 1983

North Manchester Foundry Div.
205 Wabash Road
P.O. Box 345
North Manchester, Indiana 46962

Attention: Mr. Rolf Westman

Dear Rolf:

Regarding our telephone conversation on August 5, 1983, we thank you for your verbal authorization to proceed with the testing of the waste samples collected on August 4, 1983 with your Mr. John Eaton.

The samples collected and their respective areas are as follows:

1. Shell Core Butts and Shell Waste Sand - core room
2. Black Sand Core Butts and Riddlings - core room
3. Isocure Core Butts and Waste Isocure Sand - core room
4. Oil Sand Core Butts and Waste Oil Sand - core room
5. Excess Sand from Foundry System - foundry sand system
6. Floor Sweeper Wastes - representative of overall plant
7. Slag from Furnace (Gray Iron) - outside melting area
8. Ladle Slag (Gray Iron) - inside melting area
9. Pangborn Separated Waste - cleaning room
10. Wheelabrator Separated Waste - cleaning room
11. South Dust Collector Waste - grinding room
12. North Dust Collector Waste - 3 grinders and sand system
13. Wheelabrator Separated Waste (near heat treat) - cleaning room
14. Wheelabrator Dust Collector Waste (near heat treat) - cleaning room
15. Ladle slag waste (stainless steel operation) - inside melting area
16. Iron Furnace Refractory - on site landfill
17. Stainless Steel Furnace Refractory - on site landfill
18. Pattern Shop Dust Collector - pattern shop
    Note: Sample #18 is not applicable for testing at this time.

Based on Friday's conversation RMT will be performing the following seven (7) tests:

1. EP Toxicity Test - Composite 1 - This would be a composite test of the 17 wastes, generated at North Manchester Foundry, under those parameters specified by regulations and for phenols, manganese, iron, zinc and copper because these parameters are of specific regulatory concern with regard to foundry waste disposal.

2. EP Water Test - Composite 2 - This would be a composite test of the 17 wastes to determine whether the waste is hazardous under state and federal hazardous waste criteria. This composite will be analyzed for the full list of 24 parameters.

3. EP Toxicity Test - Composite 3 - This composite test of shell core butts and shell waste sand; black sand core butts and riddlings; isocure core butts and waste isocure sand; oil sand core butts and waste oil sand will be done to determine whether the waste is hazardous under state and federal hazardous waste criteria.

4. EP Toxicity Test - Composite 4 - This composite test of excess sand from the foundry system and floor sweeper wastes will be done to determine whether the waste is hazardous under state and federal hazardous waste criteria.

5. EP Toxicity Test - Composite 5 - This composite test of slag from furnace (gray iron); ladle slag from gray iron; slag from stainless steel; gray iron furnace refractory; and stainless steel refractory will be done to determine whether the waste is hazardous under state and federal hazardous waste criteria.

6. EP Toxicity Test - Composite 6 - This composite test of Pangborn separated waste; Wheelabrator separated waste; south dust collector waste; north dust collector waste; Wheelabrator separated waste (near heat treat); and Wheelabrator dust collector waste (near heat treat) will be done to determine whether the waste is hazardous under state and federal hazardous waste criteria.

7. EP Toxicity Test - Test 7 - This test would concern only the stainless steel slag and would be tested under applicable parameters.

The purpose of the above mentioned testing will be to establish the following:

1. Determine whether the waste is hazardous under state and federal hazardous waste criteria.

2. Give some indication of the next step that North Manchester Foundry should consider regarding their on-site landfill.

Based on the scope of work listed above, the cost is estimated to be $2,500.00 to $2,800.00.

General Conditions

1. Our professional services and expenses are to be invoiced on the basis of the RMT Schedule Of Charges current at the time of invoicing.

2. Payment terms are net 20 days. Thereafter, 1½% interest per month on unpaid balance or at the prime rate plus 1½%, whichever is higher.

As soon as RMT receives the figures regarding estimated weights of the 17 wastes generated we will perform composite test 1 and 2. As of today, we are proceeding with tests 3,4,5,6 and 7.

We thank you for your interest in RMT and we look forward to working with you on this project.

Very truly yours,

Thomas J. Jancek
Process Consultant

TJJ/tck

cc: M. Smith
P. Duranceau
T. Kunes
R. Zayko

182

Residuals Management Technology, Inc.

Great Lakes Office
P.O. Box 447
Grand Ledge, Michigan 48837
(517) 627-3991

August 29, 1983

Division of Land Pollution Control
State Board of Health
1330 W. Michigan Street
P.O. Box 1964
Indianapolis, Indiana 46206-1964

Attention: Mr. David Koepper

Dear Dave:

Relative to our recent conversation I would like to give you some background on why various test procedures for North Manchester Foundry have been determined.

As you know, we have worked for a multitude of foundries located in some 25 states. We are very aware of foundry processes and with this background and knowledge we have selected various test parameters and waste materials that should be evaluated at North Manchester.

These are summarized as follows:

1. EP Toxicity Test - Composite 1

   This would be a composite test of the 17 wastes, generated at North Manchester Foundry, under those parameters specified by regulations and for phenols, manganese, iron, zinc and copper because these parameters are of specific regulatory concern with regard to foundry waste disposal.

   This test documents that the composite waste in its mixed form as it goes into the monofill is hazardous or non-hazardous.

2. EP Water Test - Composite 2

   This would be a composite test of the 17 wastes with a modified EP toxicity test using deionized water with no pH adjustment.

   This test is identical to the EP toxicity test except that de-ionized water is used instead of acetic acid as the leaching medium. This test procedure is consistent with Indiana's policy on characterization and classification of foundry sand.

   This test is important for two reasons. First, it is more representative of actual leaching conditions in a segregated foundry waste landfill (monofill). Secondly, many metals are increasingly soluable under acidic conditions. Thus comparison of leaching test results using both acidic and nonacidic conditions can be useful in evaluating the difference in potential environmental impact under different disposal conditions.

Based on our past experience testing the composite foundry waste samples gives a better indication of the leaching potential of wastes when disposed in mixed form in a foundry waste landfill (monofill) than individual sample analysis.

3. EP Toxicity Test - Composite 3

This composite test of shell core butts and shell waste sand, black sand core butts and riddlings; isocure core butts and waste isocure sand; oil sand core butts and waste oil sand will be done to determine whether the waste is hazardous under state and federal hazardous waste criteria.

This composite was selected based on our knowledge of foundry processes and the waste constituents in them. These materials all generally have a low leaching potential and have many of the same process characteristics.

4. EP Toxicity Test - Composite 4

This composite test of excess sand from the foundry system and floor sweeper wastes will be done to determine whether the waste is hazardous under state and federal hazardous waste criteria.

This composite was selected based on our knowledge of foundry processes and the waste constituents in them. These materials all generally have a low leaching potential and have many of the same process characteristics.

5. EP Toxicity Test - Composite 5

This composite test of slag from furnace (gray iron); ladle slag from gray iron; slag from stainless steel; gray iron furnace refractory; and stainless steel refractory will be done to determine whether the waste is hazardous under state and federal hazardous waste criteria.

This composite was selected based on our knowledge of foundry processes and the waste constituents in them. These materials all generally have a low leaching potential and have many of the same process characteristics.

6. EP Toxicity Test - Composite 6

This composite test of Pangborn shot separated waste; Wheelabrator shot separated waste; south dust collector waste; north dust collector waste; Wheelabrator shot separated waste (near heat treat); and Wheelabrator dust collector waste (near heat treat) will be done to determine whether the waste is hazardous under state and federal hazardous waste criteria.

This composite was selected based on our knowledge of foundry processes and the waste constituents in them. These materials all generally have a low leaching potential and have many of the same process characteristics.

7. EP Toxicity Test - Test 7

   This test would concern only the stainless steel slag and would be tested according to applicable parameters.

Based on our overall experience in the foundry industry and knowledge of foundry process we do not feel that individual waste testing is applicable at this time. If the above testing program shows any parameters of concern then applicable individual test would be done on the wastes in question.

If you have further questions relative to the above please call me at your convenience.

We are presently holding up the North Manchester Foundry testing program until we receive agreement from you relative to our proposed testing program.

Very truly yours,

Robert E. Zayko /tck

Robert E. Zayko, P.E.
Manager, Great Lakes Office

REZ/tck

cc: T. Jancek
RMT - Madison
Rolf Westman

Residuals Management Technology, Inc.

Great Lakes Office
P.O. Box 447
Grand Ledge, Michigan 48837
(517) 627-3991

August 9, 1983

North Manchester Foundry Div.
205 Wabash Road
P.O. Box 345
North Manchester, Indiana 46962

Attention: Mr. Rolf Westman

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NORTH MANCHESTER FOUNDRY, INC.

P. O. BOX 345
NORTH MANCHESTER
INDIANA 46962
AREA 219 982-2191

IB2

August 1, 1983

Division of Land Pollution Control
State Board of Health
1330 W. Michigan Street
P.O. Box 1964
Indianapolis, Indiana 46206-1964

Attention: Mr. David Koepper

SUBJECT: INDUSTRIAL LANDFILL AT OUR PLANT

Dear Mr. Koepper:

Please consider this as our first response to your Mr. Doyle's letter of July 25, 1983.

In order that we respond to your requestes in a proper and most expedient manner, we have contacted a consultant organization, that we are told, are experts in this field. This Company (NMT of Grand Ledge, Michigan) will guide us in the required testing and procedures, so that any results to be reported to you in the coming weeks will be without question as to validity.

We will do everything possible to meet all of our so called obligations under the law, but we suspicion (at this time), that we might not be able to accumulate all necessary data within the period required. Is your department open to any extensions on compliance dates?

Respectfully,
NORTH MANCHESTER FOUNDRY, INC.

Rolf Westman

RW:lu

cc: RW-Mr. Robert Zayko

JUL 25 1983

VIA CERTIFIED MAIL

Mr. Rolf Westman
North Manchester Foundry
P.O. Box 345
North Manchester, IN 46962

Dear Mr. Westman:

Re: RCRA Inspection
North Manchester Foundry

The Environmental Management Board is cooperating with the U.S. Environmental Protection Agency, Region V, in carrying out the provisions of the Resource Conservation and Recovery Act, Public Law 94-580 (RCRA). In this effort, representatives of the Environmental Management Board are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of hazardous waste. In addition to RCRA requirements, facilities are being inspected to determine compliance with Environmental Management Board 320 IAC 4, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements."

This letter is to inform you that on July 12, 1983, an inspection of North Manchester Foundry, located in North Manchester, Indiana, was conducted by Mr. David Koepper of the Division of Land Pollution Control, Indiana State Board of Health. You represented your firm at this inspection.

The following violation of RCRA and 320 IAC 4 pertaining to the operation of your facility was noted:

40 CFR 262.11 and 320 IAC 4-4-1	Generator has not determined if waste is hazardous.

The inspection also revealed that open dumping is taking place. Open dumping is a violation of Environmental Management Act 13-7 and, if the waste is hazardous, 320 IAC 4.

North Manchester Foundry, within 30 calendar days of receipt of this letter, shall achieve compliance with the following requirements:

1. Determine if the waste generated is hazardous as defined by Subparts C and D of 40 CFR 261 and 320 IAC 4-3-1. (If you believe the waste is not hazardous, include evidence to support your decision.)

2. All open dumping must cease and access to the site must be restricted.

Your Company shall submit to this office, within 35 calendar days of receipt of this letter, a written detailed explanation of the steps taken to achieve compliance. The letter shall state the date compliance was achieved.

Please direct your response to this letter and any questions to Mr. David Koepper of the Division of Land Pollution Control, Indiana State Board of Health, 317/633-0398.

Very truly yours,

Guinn Doyle

Guinn Doyle, Chief
Hazardous Waste Management Branch
Division of Land Pollution Control

DJK/tr
Enclosure
cc: Wabash County Health Department
tr 6370m 7/20/83

NOTICE OF VIOLATION
REVIEW/CLOSE OUT

FACILITY: North Manchester Foundry DATE INSPECTED: 7/12/83

LOCATION: North Manchester DATE RESPONSE: 8/1/83 & others

I.D.#: ——— DATE OF REVIEW: 5/21/83

GENERATOR [ ] TRANSPORTER [ ] TSD [ ]

COMMENTS ON INSPECTION: 1st inspection [X] followup [ ]

ANALYSIS OF RESPONSE

Generator had all waste streams on site analyzed. None were found to be hazardous. Navy involved w/ special/solid waste exemption since request for the dump site

ACTION TAKEN

1 [X] RETURNED TO COMPLIANCE

2 [ ] ADDITIONAL TIME REQUESTED(recommendations in analysis section)

3 [ ] FOLLOWUP INSPECTION RECOMMENDED

4 [ ] RECOMMEND ENFORCEMENT ACTION

!!!DON"T FORGET STATUS LOG!!!

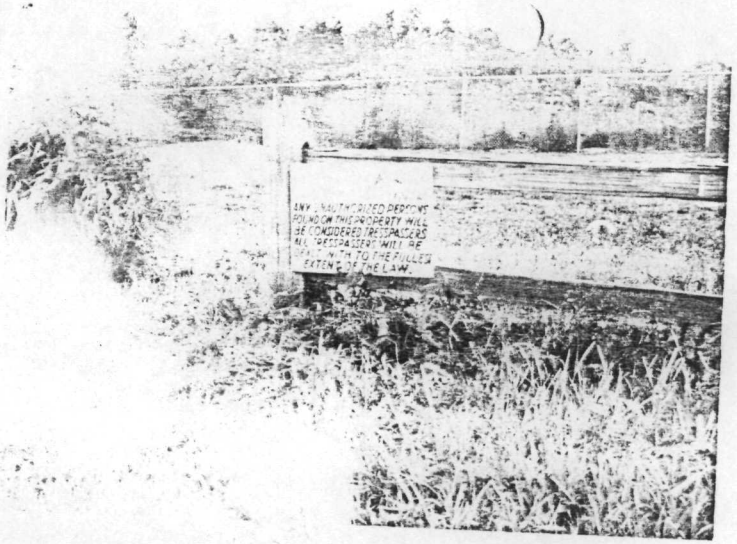
David L. Pratt
REVIEWER'S NAME

SECTION CHIEF

State Form 12887

SRH66-020
7/83

LPC - 7/12/83


ANY UNAUTHORIZED PERSONS
ON OR ON THIS PROPERTY WILL
BE CONSIDERED TRESPASSERS
ALL TRESPASSERS WILL BE
PROSECUTED TO THE FULLEST
EXTENT OF THE LAW.